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**Attorneys for Defendant**

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

**UNITED STATES OF AMERICA,**

Plaintiff,

vs.

**JOSEPH DAVID EMERSON,**

Defendant.

Case No. 3:23-mj-00185

**UNOPPOSED MOTION TO  
CONTINUE GRAND JURY REPORT  
AND ARRAIGNMENT DATE**

Comes now Defendant Joseph David Emerson, by and through his attorneys, Noah Horst, Ethan Levi, and Norah Van Dusen, and moves this Court for an Order to Continue the Grand Jury report due date and arraignment date beyond 30 days. The current report due date is May 20, 2025, and the parties would like to continue the due date and arraignment to August 12, 2025.

I have discussed with Mr. Emerson his right to be indicted within 30 days of his arrest under 18 U.S.C. § 3161(b). Mr. Emerson understands his rights and knowingly waives his right to be arraigned within 30 days.

Mr. Emerson is presently out-of-custody.

The Assistant United States Attorney assigned to this matter, Parakram Singh, does not oppose this motion to continue.

**DATED** this 14<sup>th</sup> day of May, 2025.

By: s/ Noah Horst  
**Noah Horst**, OSB No. 076089  
**Of Attorneys for Defendant**